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March 9, 2015

Via ECF & U.S. Mail

Hon. William H. Pauley
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1920
New York, NY 10007

Re: *Ganek v. Leibowitz, et al.*, No. 15-CV-1446 (WHP)

Dear Judge Pauley:

I write on behalf of Plaintiff David Ganek to request that the Court docket the attached February 25, 2015 declaration of Plaintiff's counsel, Anna Benvenuti Hoffmann.

Prior to filing the complaint in this action, Plaintiff submitted a request to the designated Part I judge, the Honorable Jed S. Rakoff, to determine whether portions of the complaint should be filed under seal. Plaintiff submitted that attached Declaration in connection with that request. Judge Rakoff's order, which found no basis for filing portions of the complaint under seal, has been docketed in this action. *See* Doc. No. 3. Plaintiff now respectfully requests that this Court docket the attached Declaration so that the information presented to Judge Rakoff is made part of the public record. Plaintiff has not attached the exhibits referenced in the Declaration because, other than Plaintiff's draft complaint (which has since been filed), the exhibits are publicly available.

Although Plaintiff has not yet served the individual defendants in this matter, it is anticipated that the Civil Division of the U.S. Attorney's Office for the Southern District of New York will accept service on behalf of all defendants. Plaintiff's counsel has contacted counsel at the Civil Division, and they do not oppose this request.

Sincerely,

A handwritten signature in blue ink that reads "Farhang Heydari".

Farhang Heydari

Enclosures (1)